

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

**IN RE:** : **Chapter 13 Proceedings**

**Kevin Lee Shearer** : **Case No.: 19-62544**

**Debtor** : **Judge Russ Kendig**

**OBJECTION TO PROOF OF CLAIM**

Now comes Standing Chapter 13 Trustee, Dynele L. Schinker-Kuharich, and hereby objects to Proof of Claim No. 018 filed herein by debtor on behalf of creditor, Internal Revenue Service. This claimant did not provide a statement of account or any other attachments required to provide proof of said claim as required by Bankruptcy Rule 3001(c).

WHEREFORE, Trustee prays that the above Proof of Claim be disallowed in its entirety.

/s/ Dynele L. Schinker-Kuharich  
Dynele L. Schinker-Kuharich (0069389)  
Chapter 13 Trustee  
A. Michelle Jackson Limas (0074750)  
Staff Counsel to the Chapter 13 Trustee  
200 Market Avenue North, Ste. 30  
Canton, OH 44702  
Telephone: 330.455.2222  
Facsimile: 330.754.6133  
Email: [DLSK@Chapter13Canton.com](mailto:DLSK@Chapter13Canton.com)

## NOTICE OF OBJECTION TO PROOF OF CLAIM

Dynele L. Schinker-Kuharich, Standing Chapter 13 Trustee in this case, has filed an Objection to your Proof of Claim in the bankruptcy case.

**The Proof of Claim may be reduced, modified or eliminated. You should read these papers carefully and discuss them with your attorney if you have one.**

If you do not want the Court to eliminate or change your Proof of Claim, then on or before **June 19, 2020**, you or your lawyer must file with the Court a written response to the Objection, explaining your position, at:

Clerk of Court  
United States Bankruptcy Court  
Ralph Regula Federal Building  
401 McKinley Ave S.W.  
Canton, OH 44702

If you mail your response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above.

You must also send a copy to:

Dynele L. Schinker-Kuharich, Chapter 13 Trustee  
200 Market Avenue North, Suite 30  
Canton, Ohio 44702

and the Debtor's Attorney at:

Deborah L. Mack  
53 East Main Street  
Lexington, OH 44904

If you file a written response to the Objection you must also telephone the Court's Courtroom Deputy at 330-458-2478 to obtain a hearing date and time for your response to be heard by the Court, and you must file a notice of the date and time of the hearing.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the Objection to your Proof of Claim.

Date: May 20, 2020

/s/ Dynele L. Schinker-Kuharich  
Dynele L. Schinker-Kuharich (0069389)  
Chapter 13 Trustee  
A. Michelle Jackson Limas (0074750)  
Staff Counsel to the Chapter 13 Trustee  
200 Market Avenue North, Ste. 30  
Canton, OH 44702  
Telephone: 330.455.2222  
Facsimile: 330.754.6133  
Email: [DLSK@Chapter13Canton.com](mailto:DLSK@Chapter13Canton.com)

## **CERTIFICATE OF SERVICE**

I certify that on May 20, 2020, a true and correct copy of the Objection to Proof of Claim and Notice thereof was served via the Court's Electronic Case Filing System upon these entities and individuals who are listed on the Court's Electronic Mail Notice List:

- Office of the United States Trustee, at [RegisteredEmailAddress]@usdoj.gov
- Office of the Chapter 13 Trustee, at dlsk@Chapter13Canton.com
- Deborah L. Mack, Counsel for Kevin Lee Shearer, at Debbie@ohiofinancial.lawyer

And by regular U.S. Mail, postage prepaid, upon:

Kevin Lee Shearer, Debtor  
1814 Sawmill Place  
Mansfield, OH 44904

Internal Revenue Service, Creditor  
PO Box 7346  
Philadelphia, PA 19101-7346

Internal Revenue Service  
Insolvency Group 6  
1240 East Ninth Street, Room 493  
Cleveland, OH 44199

Office of the United States Attorney  
Attn: Bankruptcy Section  
Carl B. Stokes United States Courthouse  
801 West Superior Avenue, Suite 400  
Cleveland, OH 44113-1852

Attorney General of the United States  
U.S. Department of Justice Tax Division  
Civil Trial Section, Northern Region  
P.O. Box 55, Ben Franklin Station  
Washington, D.C. 20044

/s/ Dynele L. Schinker-Kuharich  
Dynele L. Schinker-Kuharich  
Chapter 13 Trustee